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July 26, 2016

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VIA ECF

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The Honorable Pamela K. Chen
United States District Court for the
Eastern District of New York
225 Cadman Plaza East, Chambers N 631
Brooklyn, New York 11201

Re: **Sammy Rodgers v. American Airlines, Inc. et al.,**
Case No. 1:16-cv-00731-PKC-RER (E.D.N.Y.)

Dear Judge Chen:

Pursuant to Your Honor's July 19, 2016 Order, Defendants American Airlines, Inc. and Association of Professional Flight Attendants submit this joint letter proposing the following briefing schedule for their motions to dismiss.

- Defendants must file their motions to dismiss by August 26, 2016.
- Plaintiff must file his oppositions to such motions by September 16, 2016.
- Defendants must file their reply briefs in support of such motions by September 30, 2016.

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Respectfully submitted,

/s/ Sloane Ackerman

for O'MELVENY & MYERS LLP
Counsel for Defendant American Airlines, Inc.

/s/ Adam Bellotti

for BREDHOFF & KAISER, PLLC
Counsel for Defendant Association of
Professional Flight Attendants

cc: Sammy Rodgers (via Federal Express and e-mail)
Counsel of Record (via ECF)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SAMMY RODGERS,

Plaintiff,

-against-

AMERICAN AIRLINES, INC.,
ASSOCIATION OF PROFESSIONAL
FLIGHT ATTENDANTS,
DIVINE & SERVICE LTD. a/k/a
D&S GLOBAL SOLUTIONS LTD.,

Defendants.

Civil Action No. 1:16-cv-00731-PKC-RER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 26, 2016, the foregoing document was served on Plaintiff, via Federal Express overnight delivery and email, to: Sammy Rodgers, 2201 South Broadway Street, Little Rock, Arkansas 72206 (Telephone: 718-509-9288; Email: milktrain@live.com).

Dated: New York, New York
July 26, 2016

By: /s/ Sloane Ackerman
Sloane Ackerman